

# HAFETZ & NECHELES LLP

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May 20, 2020

## **VIA ECF**

Honorable Nicholas G. Garaufis  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *United States v. Clare Bronfman*, 18-cr-204 (NGG)

Dear Judge Garaufis:

We write on behalf of our client Clare Bronfman, and with the consent of the government, to seek an adjournment of Ms. Bronfman's currently scheduled June 25 sentencing date and the current dates for submission of sentencing memoranda. In making this request we note that Ms. Bronfman, after conferring with counsel, does not consent to proceeding with her sentencing hearing via video or teleconference. She respectfully requests that the Court adjourn her sentencing until such date as the sentencing can be conducted in person at the Courthouse.

On April 3, 2020, the Court ordered that Ms. Bronfman's sentencing would take place on June 25, 2020. Although the Chief Judge's current order addressing the pandemic (Admin. Order 2020-15) and providing for limited operations for essential proceedings at the Courthouse only extends through June 15, we anticipate that in person proceedings such as sentencing hearings will not resume in the Eastern District until sometime after June. Since the Chief Judge issued the current order on April 21, 2020, Governor Cuomo has extended New York Pause, which bans mass gatherings in the state, encourages residents to remain at home, limits all non-essential travel and limits personal contact, and closes all nonessential businesses for the New York City area until at least the end of May. Reports indicate that the New York City region is unlikely to meet the criteria for Phase One reopening until mid-June at the earliest, and pandemic-related travel bans, which prevent Ms. Bronfman's family from traveling to the United States from Europe for her sentencing, appear likely to remain in place through July.

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Accordingly, with the consent of the government, the defendant Clare Bronfman respectfully seeks a postponement of her sentencing date as well as the dates for submission of the parties' sentencing memoranda.

Respectfully submitted,

/s/

Kathleen E. Cassidy

cc: AUSA Tanya Hajjar (via ECF)